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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- Affects PG&E Corporation
 - Affects Pacific Gas and Electric Company
 - Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON
RESPONSES TO NINETY-NINTH
THROUGH ONE HUNDRED THIRD
OMNIBUS OBJECTIONS TO CLAIMS AND
REQUEST FOR ORDERS BY DEFAULT AS
TO UNOPPOSED OBJECTIONS**

[Re: Dkt. Nos. 11111, 11114, 11117, 11120, and
11123]

**Regarding Objections Set for Hearing
September 29, 2021, at 10:00 a.m. (Pacific
Time)**

REQUEST FOR ENTRY OF ORDER BY DEFAULT

PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”), that the Court enter orders by default on the following five omnibus claims objections (collectively, the “**Omnibus Objections**”):

Docket Number	Omnibus Objection
11111	<i>Reorganized Debtors' Ninety-Ninth Omnibus Objection to Claims (Books and Records Claims / Satisfied Claims / No Liability Claims / Passthrough Claims)</i> (the " Ninety-Ninth Omnibus Objection ")
11114	<i>Reorganized Debtors' One Hundredth Omnibus Objection to Claims (Third-Party Claims)</i> (the " One Hundredth Omnibus Objection ")
11117	<i>Reorganized Debtors' One Hundred First Omnibus Objection to Claims (Duplicative and Incorrect Claims)</i> (the " One Hundred First Omnibus Objection ")
11120	<i>Reorganized Debtors' One Hundred Second Omnibus Objection to Claims (No Legal Liability Claims)</i> (the " One Hundred Second Omnibus Objection ")
11123	<i>Reorganized Debtors' One Hundred Third Omnibus Objection to Claims (ADR No Liability Claims)</i> (the " One Hundred Third Omnibus Objection ")

RELIEF REQUESTED IN THE OMNIBUS OBJECTIONS

The Omnibus Objections seek to either (a) disallow and/or expunge or (b) allow in reduced amounts the Proofs of Claim listed in Exhibits 1-4 to the Ninety-Ninth Omnibus Objection, Exhibits 1-3 to the One Hundredth Omnibus Objection, and Exhibit 1 to each of other three Omnibus Objections.

NOTICE AND SERVICE

The Reorganized Debtors filed a Notice of Hearing with respect to each Omnibus Objection [Docket Nos. 11113, 11116, 11119, 11122, and 11125]. The Omnibus Objections also were supported

1 by the respective declarations of Robb McWilliams [Docket Nos. 11112, 11118, and 11124], Renee
2 Records [Docket No. 11115], and A. Anna Capelle [Docket No. 11121]. The Omnibus Objections, the
3 Notices of Hearing, and the Declarations were served as described in the *Certificate of Service of Sonia*
4 *Akter*, filed on August 25, 2021 [Docket No. 11156], each holder of a claim listed on Exhibits 1-4 to
5 the Ninety-Ninth Omnibus Objection, Exhibits 1-3 to the One Hundredth Omnibus Objection, and
6 Exhibit 1 to each of the other three Omnibus Objections received a notice customized to include (i) the
7 claim number, debtor, claim amount and priority, and the basis for Reorganized Debtors' objection
8 with respect to the applicable claim to be disallowed and/or expunged or allowed in a reduced amount,
9 and, if applicable (ii) the claim number, claim amount and priority of the surviving claim for each
10 counterparty.

11 The deadline to file responses or oppositions to the Omnibus Objections has passed. The
12 Reorganized Debtors have received the following formal and informal responses:

Docket No.	Claimant	Claim No.	Resolution
Ninety-Ninth Omnibus Objection			
Informal	Valley Clean Energy Alliance	65788	The Ninety-Ninth Omnibus Objection is SUSTAINED with respect to this Claim.
One Hundred First Omnibus Objection			
Informal	Gonsalves, Lorraine	87242	The informal response received from the Claimant does not refer to this Claim. However, in an abundance of caution, the One Hundred First Omnibus Objection is going forward on a contested basis with respect to this Claim at the September 29, 2021, Omnibus Hearing.
One Hundred Second Omnibus Objection			
11239	Weidman, III, Wm. F.	10281	The One Hundred Second Omnibus Objection is going forward on a contested basis with respect to this Claim at the September 29, 2021, Omnibus Hearing.

Docket No.	Claimant	Claim No.	Resolution
One Hundred Third Omnibus Objection			
Informal	Gonsalves, Lorraine	81398	The One Hundred Third Omnibus Objection is going forward on a contested basis with respect to this Claim at the September 29, 2021, Omnibus Hearing.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an attorney with the law firm of Keller Benvenutti Kim LLP, co-counsel for the
10 Reorganized Debtors.

2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no
12 responses have been filed with respect to the Omnibus Objections except as described herein.

3. This declaration was executed in Sunnyvale, California.

WHEREFORE, the Reorganized Debtors hereby request entry of Orders (i) disallowing and/or
15 expunging or (ii) allowing in a reduced amount the Proofs of Claim listed in Exhibit 1¹ to this
16 Request, which listed Claims are identical to those listed in Exhibits 1-4 to the Ninety-Ninth Omnibus
17 Objection, Exhibits 1-3 to the One Hundredth Omnibus Objection, and Exhibit 1 to each of the other
18 three Omnibus Objections, except as otherwise discussed above.

Dated: September 22, 2021

KELLER BENVENUTTI KIM LLP

By: /s/ Thomas B. Rupp
Thomas B. Rupp

Attorneys for Debtors and Reorganized Debtors

¹ The portions of Exhibit 1 listing Claims to be expunged pursuant to the One Hundred Third Omnibus Objection have been redacted in accordance with the *Order Granting Motion to Redact Documents Filed in Support of Reorganized Debtors' Omnibus Objection to Claims*, entered on August 23, 2021 [Docket No. 11137]. Unredacted versions for the Court's review will be filed under seal.